

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

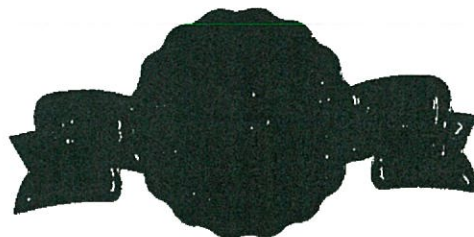
KATHLEEN KITTERMAN,
ANNA CRONIN,
CORRIE BALL,
MARVIN BALL,
MARGARET BROGAN and
EVAN JONES,

Plaintiffs,

vs.

CASE NO.: 2:12cv146

CLAUDIO TOVAR-GUZMAN,
FORTINO GARCIA AND SONS
HARVESTING, INC., and,
KUZZEN'S,
Defendants.



DEPOSITION OF DAVID GARCIA

Taken on Behalf of the Plaintiffs

DATE TAKEN: May 29, 2013

TIME: 12:27 p.m. - 1:36 p.m.

PLACE: Gregory Court Reporting
2650 Airport Road South, Ste. A
Naples, FL 34112

Examination of the witness taken before:

Jan D. Bickford, Court Reporter
Gregory Court Reporting Service, Inc.
2650 Airport Road South, Suite A
Naples, Florida 34112
Telephone: (239) 774-4414 FAX: (239) 774-5261

CERTIFIED COPY

EXHIBIT

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tabbles

1 person?

2 A No.

3 Q Okay. Do you know his reputation for
4 truthfulness?

5 A No.

6 Q You don't know what other people think about him?

7 A No.

8 Q Okay. Other than seeing him in South Carolina on
9 the farms and in Virginia on the farm, do you see him in
10 Florida?

11 A Yes.

12 Q And you just -- is that also just a working
13 relationship?

14 A Yes.

15 Q Do you ever socialize with him outside the farm?

16 A No.

17 Q Now, in his deposition Fortino Garcia said that
18 Claudio Tovar-Guzman worked on Kuzzen's farm in June of
19 2011 and yet the paperwork doesn't show it.

20 Can you explain why?

21 A No, I can't.

22 Q Okay. Do you believe -- would you believe
23 Fortino Garcia when he says that Claudio Tovar-Guzman
24 worked on the farm in South Carolina?

25 MR. CASEY: Objection to form. You can answer it

1 if you know.

2 THE DEPONENT: Will you repeat the question
3 please?

4 BY MR. BROGAN:

5 Q I asked whether you would believe Fortino Garcia
6 if he said that this guy, Claudio Tovar-Guzman, worked on
7 the farm -- Kuzzen's farm in South Carolina in June of
8 2011?

9 MR. CASEY: Same objection.

10 THE DEPONENT: If he says he was there, I would
11 just go by what he said.

12 BY MR. BROGAN:

13 Q Okay.

14 A But the records show that he was not there, I
15 guess.

16 Q Okay. Do you know Victor Roman?

17 A Victor Roman? I believe he's one of his bus
18 drivers.

19 Q I believe he's a bus driver, yes.

20 Now, have you ever attended meetings on a
21 managerial level where you -- Lipman talked about hiring
22 of illegal aliens?

23 A Have I ever attended a meeting that talked about
24 illegal aliens among things?

25 Q Right.